TO: The Federal Communications Commission
FROM: AccuWeather, Inc
DATE: June 25, 2010
SUBJECT: Comments from AccuWeather, Inc regarding:
DA 10-1035 Released: June 4, 2010
OFFICE OF ENGINEERING AND TECHNOLOGY REQUESTS INFORMATION ON USE OF 1675 â€“ 1710 MHz BAND
ET Docket No. 10-123

AccuWeather respectfully submits that the spectrum in question is currently utilized for critical purposes that have significant value to the United States in saving lives, protecting property and growing the American economy.

AccuWeather is one of the many non-federal entities that employ receive-only stations for reception of Meteorological Satellite Service space station downlink transmissions.

By way of background, AccuWeather is a weather information and warning company that provides meteorological forecasts, warnings, data, systems and services to media, business, government, and the public. We are part of Americaâ€™s Weather and Climate Industry.

Our media services include:

â€¢ Operation of one of the most accessed public-reaching weather websites, with approximately 10 million unique users each month in the United States;

â€¢ Operation of one of the 20 most accessed mobile web sites of any kind in the United States;

â€¢ Provision of weather content to more than 50,000 websites operated by other entities, including the websites of The New York Times, The Washington Post, the local newspapers owned by Gannett, the ABC-owned television stations, the CBS radio network, and The Wall Street Journal;

â€¢ Operation of The AccuWeather Television Network, in partnership with local television stations and broadband providers in about 100 U.S. markets, reaching more than 60% of all U.S. households;

â€¢ Provision of forecasts and/or graphics (including satellite images) to more than 150 U.S. television stations;

â€¢ Provision and forecasts and broadcasts to more than 150 U.S. radio stations, including WINS

radio in New York City, the most listened to radio station in the nation;

â€¢ Provision of print weather pages for more than 300 U.S. newspapers; and

â€¢ Provision of weather content for digital signage, interactive TV, and other public media.

It is estimated that more than half of all people in the United States view or hear a weather forecast or presentation made by AccuWeather meteorologists or including AccuWeather content every day. AccuWeather also reaches an expanding international audience of tens of millions.

Our commercial services include:

â€¢ Customized forecasts, websites, and GIS services which are used by thousands of businesses and government agencies to make critical decisions affecting safety and economic well-being; and

â€¢ Customized warning services for severe thunderstorms and tornadoes, hurricanes and tropical storms, high winds, snow and ice, heavy rain and flooding, and a variety of other potentially life-threatening, damaging or disruptive weather events, utilized by thousands of factories, industrial plants, businesses, public gathering places, universities, school districts and government agencies to protect lives and property.

The imagery and data received from Satellite Service space station downlink transmissions that utilize the 1675-1710 MHz band is used by AccuWeather as a tool in the creation of the forecasts and warnings that it makes available to its media and commercial clients and to the general public.

AccuWeather also supplies the imagery and data received to its television station, internet and other media partners for use in their public broadcasts and other public-reaching activities.

In its Public Notice, the FCC states that â€œIt may be possible that reception of the weather satellite downlink transmissions could occur at a relatively small number of sites and be distributed via terrestrial services, such as over the Internet or other managed services.â€

We do not believe that this proposed solution is viable, for several reasons:

1. The entire set of all the raw satellite data (including rapid scan and super rapid scan additional data during critical weather situations) is available in the current downlink transmission, so that we (and others) can utilize the complete data set in the generation of a variety of satellite images and data products used by AccuWeather and our clients, in algorithms that generate a variety of current and forecast products, and as a tool in the production of forecasts and warnings by AccuWeather

meteorologists.

There is concern that if the current satellite-based dissemination was replaced with a terrestrial dissemination method such as the internet, then the complete dataset (all raw imager and sounder data) would no longer be available and, if it were, that it would not be available in a timely manner.

2. Although a subset of the raw satellite data is currently available through the internet, there is a significant lag time between the satellite delivery and the internet availability, generally on the order of five to ten minutes.

We, and others, utilize the satellite data as a component of our warning decisions which save lives and property â€“ particularly in areas where there is no radar coverage.

While for many items, a delay of this magnitude might be trivial, given the nature of rapidly changing weather situations and importance of this data in saving lives and protecting property, the timeliness of this data is critical.

3. The satellite data is a very large data set and, thus far, internet dissemination of large meteorological data sets has been problematic in both timeliness and reliability â€“ for example, there have been numerous issues with the internet transmission of level II Doppler radar data. The existing dissemination system for satellite data has proved to be extremely reliable.

4. The current satellite based dissemination method requires only that the hardware, systems and software already in place remain so, and the only additional requirement is a backup generator in the case of power failure. With internet-based dissemination, there are more potential failure points, including the routers and telecommunications circuits through the entire pipeline. Therefore, the current satellite based method is much more reliable during times of commercial power interruptions etc â€“ such as those that occur in the aftermath of a natural disaster.

5. The data volume from the GOES satellites will increase substantially after the GOES-R deployments (scheduled for 2015 and 2016). This would further complicate the ability to disseminate the data in question via the internet.

In addition, AccuWeather and others have made significant financial investments in the infrastructure needed from both the hardware and software sides to receive the data in the raw formats as quickly as possible. A change to internet or other delivery would require new investments to replace these existing architectures.

It has been estimated that weather directly impacts about one quarter of the U.S. economy. It directly

affects both safety and quality of life. The satellite data is a critical component of the American meteorological communityâ€™s ability to provide forecasts and warnings that save lives, protect property, improve quality of life, and grow the economy.

We strongly believe that if the current availability of the weather satellite downlink transmissions were to end, there would be significant adverse effects on safety and economic activity in the United States.

If you have any questions please feel free to contact me directly.

Sincerely,
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